

Tamara Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

July 31, 2025

Via CM/ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Application GRANTED.
SO ORDERED.
8/4/2025


P. Kevin Castel
United States District Judge

**Re: *United States v. Joseph D'Ambrosio*
25 Cr. 317 (PKC)**

Dear Judge Castel,

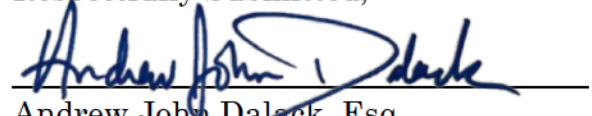
I write to respectfully request that the Court modify Joseph D'Ambrosio's bail conditions to permit him to remain on pre-trial supervision without obtaining any additional co-signers to his \$150,000 personal recognizance bond. The Government, by AUSA Matthew Shahabian, does not object to this application.

On July 17, 2025, shortly before he appeared before the Court to plead guilty to a one-count information, Mr. D'Ambrosio was presented before the Honorable Jennifer E. Willis and was released on his own signature to a personal recognizance bond. Although Pre-Trial Services recommended that Mr. D'Ambrosio be released on his own recognizance with no travel restrictions within the continental United States, the parties nevertheless agreed on a bail package that included a \$150,000 personal recognizance bond, with one additional financially responsible co-signer, and travel restrictions to the Southern and Eastern Districts of New York (among other conditions). *See* Dkt. No. 4.

Since Mr. D'Ambrosio's presentment and guilty plea on July 17, he has adhered to all his bail conditions and is awaiting a pre-sentence interview, currently scheduled for August 8, 2025. However, Mr. D'Ambrosio has not been able to obtain a co-signer to the bond. I have discussed the matter with AUSA Shahabian, who—given the totality of the circumstances, including Mr. D'Ambrosio's proactive confession to authorities, self-surrender and lack of criminal history—does not oppose removing the co-signer requirement from Mr. D'Ambrosio's bail conditions.

I thank the Court for its consideration of this unopposed application.

Respectfully Submitted,

A handwritten signature in blue ink, reading "Andrew John Dalack", is written over a horizontal line.

Andrew John Dalack, Esq.
Assistant Federal Defender
(646) 315-1527

Cc: AUSA Matthew Shahabian